

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

ROBERT BOLLINGER,

Plaintiff,

v.

Case No. 2:25-CV-10790

Hon. Terrence G. Berg

Mag. Judge Anthony P. Patti

BOLLINGER MOTORS, INC.,

Defendant.

_____ /

**STIPULATION FOR DISCHARGE AND REMOVAL OF RECEIVER AND
DISMISSAL OF CASE WITH PREJUDICE**

Upon entry of the Order of Discharge and Removal of Receiver and Dismissal of Case with Prejudice approving this Stipulation, the parties agree and stipulate that (1) Defendant Bollinger Motors, Inc. (“Bollinger Motors”) will have satisfied all of its obligations to Plaintiff Robert Bollinger (“Robert Bollinger”); (2) Third-party Mullen Automotive, Inc. (“Mullen”) has committed to fund the expenses of the Receiver, including the payroll for Bollinger Motors, from May 26, 2025, until the date of entry of the Order of Discharge and Removal of Receiver and Dismissal of Case with Prejudice approving this Stipulation for Dismissal or until the Court determines not to enter such an Order; (3) Mullen has resolved the restraining orders against it by GEM Yield Bahamas Limited in the Southern District of New York, allowing it to fund its operations and those of Bollinger Motors; (4) there is no ongoing case or controversy warranting the continuing oversight of a Receiver over

Bollinger Motors since Robert Bollinger was the only secured creditor of Bollinger Motors; and (5) the parties hereto agree to the attached Order. As a result,

1. This lawsuit shall be dismissed with prejudice, with each party responsible for the payment of its own costs and fees;

2. Gene Kohut shall be discharged and removed as receiver over Bollinger Motors upon Mullen's payment of his fees and costs beginning on May 26, 2025, consistent with the Order Appointing Receiver; and

3. The parties waive the final accounting requirement set forth in paragraph 30 of the Order Appointing Receiver.

SO STIPULATED

WINTHROP & WEINSTINE, P.A.

s/H. William Burdett, Jr.

H. William Burdett, Jr. (P63185)

Attorneys for Robert Bollinger

MCDONALD HOPKINS, LLC

s/Stephen M. Gross

Stephen M. Gross (P35410)

Attorneys for Receiver, Gene Kohut, on behalf of Borrower and Bollinger Motors, Inc.

DYKEMA

s/Brian M. Moore

Brian M. Moore (P58584)

Attorneys for Mullen Automotive, Inc.

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**ORDER OF DISCHARGE AND REMOVAL OF RECEIVER AND
DISMISSAL OF CASE WITH PREJUDICE**

This matter having come before the Court based on the Stipulation of Dismissal with Prejudice on behalf of Plaintiff Robert Bollinger, Defendant Bollinger Motors, Inc., and Third Party Mullen Automotive, Inc.:

IT IS ORDERED that the Receiver Gene Kohut is discharged and removed as receiver for Bollinger Motors upon payment of his outstanding costs, fees, and expenses incurred beginning on May 26, 2025 by Mullen Automotive, Inc.;

IT IS FURTHER ORDERED that, without an active case or controversy since Defendant Bollinger Motors will have satisfied its obligations to Plaintiff Robert Bollinger, the only secured creditor, upon entry of this Order, this action is dismissed with prejudice, with each party to bear its own attorneys' fees and costs.

This Order resolves the last pending claim and shall close this case.

SO ORDERED.

Dated: June 2, 2025

s/Terrence G. Berg
DISTRICT COURT JUDGE

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